

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR  
BENGULESCU, GERALD BEZEMS,  
SCOTT CROCKETT, FIFAT GORENER,  
CHRISTOPHER LESIEUR, LAWRENCE  
MARCUS, and MIKHAIL  
SULEYMANOV, individually and on  
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,  
BAVARIAN MOTOR WORKS, and  
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR ATTORNEYS' FEES,  
EXPENSES, AND INCENTIVE AWARDS**

**PLEASE TAKE NOTICE** that at the Final Fairness Hearing scheduled for September 10, 2018 at 2:30 p.m., Plaintiffs will move to have the Court enter the proposed order submitted herewith that will grant their unopposed motion seeking (1) the payment of \$3,022,000 to Plaintiffs' counsel for the payment of their attorneys' fees and reimbursement of expenses, and (2) the payment of incentive awards in the amount of \$3,500 each for Plaintiffs Joon Bang, Razvan Victor

Bengulescu, Gerald Bezems, Scott Crocket, Fifat Gorener, Christopher LeSieur, Lawrence Marcus, and Mikhail Suleymanov (\$28,000 in total).<sup>1</sup>

**PLEASE TAKE FURTHER NOTE** that Plaintiffs will rely on the Memorandum of Law, Declarations of Counsel and other related materials in support of this motion.

**PLEASE TAKE FURTHER NOTE** that Defendants do not oppose this motion.

Dated: August 9, 2018

Respectfully submitted,

**SAUDER SCHELKOPF LLC**

By: //s// Matthew D. Schelkopf

Joseph G. Sauder

Matthew D. Schelkopf

Joseph B. Kenney

555 Lancaster Avenue

Berwyn, PA 19312

Telephone: (610) 200-0581

jgs@sstriallawyers.com

mds@sstriallawyers.com

jbk@sstriallawyers.com

David C. Wright

**MCCUNE WRIGHT AREVALO, LLP**

3281 East Guasti Road, Suite 100

Ontario, CA 91761

Telephone: (909) 557-1250

dcw@mccunewright.com

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<sup>1</sup> Plaintiffs will also request that the Court enter an order granting final approval to the settlement and dismissing this action with prejudice. A motion seeking that relief will be filed separately.

Eric D. Barton  
Melody Dickson  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: (816) 701-1100  
ebarton@wcllp.com  
mdickson@wcllp.com

*Attorneys for Plaintiffs and the  
Proposed Settlement Class*

**CERTIFICATE OF SERVICE**

I, Matthew D. Schelkopf, hereby certify that the foregoing **Notice of Plaintiffs' Unopposed Motion for Attorneys' Fees, Expenses, and Incentive Awards** was filed on this 9th day of August, 2018, using the Court's CM/ECF system, thereby electronically serving it on all counsel of record in this case.

/s/ Matthew D. Schelkopf  
Matthew D. Schelkopf